

Department of Energy

Richland Operations Office P.O. Box 550 Richland, Washington 99352

99-RU-0275

Mr. M. J. Lawrence, Executive Vice President General Manager TWRS Project BNFL Inc. 3000 George Washington Way Richland, Washington 99352

Dear Mr. Lawrence:

RESPONSE TO PERSONNEL TRAINING AND QUALIFICATION INSPECTION REPORT

Reference: 1. BNFL Letter 002543, April 26, 1999, TWRS-P Contract No. DE-AC06-96RL13308 – W375 – Response to Inspection Report, IR-99-001

2. DOE Letter 99-RU-0213, March 24, 1999, Personnel Training and Qualification Inspection Report, IR-99-001

The Office of Radiological, Nuclear, and Process Safety Regulation of the TWRS-P Contractor (Regulatory Unit) has reviewed the BNFL Inc. response (Reference 1) to the Personnel Training and Qualification Inspection Report, IR-99-001 (Reference 2). The information requested in Reference 2 was provided in Reference 1. The Regulatory Unit (RU) has determined that the response is acceptable and that the corrective action commitments, if properly implemented, should be sufficient to address the findings (IR-99-001-01-FIN through IR-99-001-03-FIN). The RU has no additional requests for information on this matter at this time.

In accordance with RU Management Directive 2.3, "Commitment Management System," the RU will track the BNFL Inc. corrective action commitments that were described in Reference 1 per the enclosed "Table 1 – BNFL Inc. Personnel Training and Qualification Corrective Action Commitments."

The RU will verify your corrective actions during future inspection activities. Once the corrective actions have been verified, the RU will close Inspection Findings IR-99-001-01-FIN through IR-99-001-03-FIN.

Nothing in this letter should be construed as changing the Contract (DE-AC06-96RL13308). If you have any questions on the tracking of these items, inspection follow-up, or any other questions regarding this inspection, please contact Pat Carier of my staff on (509) 376-3574.

Sincerely,

D. Clark Gibbs, Regulatory OfficialOffice of Radiological, Nuclear andProcess Safety Regulation

RNP:JWM

Enclosure:
Table 1 - BNFL Inc. Personnel Training and
Qualification Corrective Action
Commitments

cc w/encl: D. W. Edwards, BNFL

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Sincerely,

D. Clark Gibbs, Regulatory OfficialOffice of Radiological, Nuclear andProcess Safety Regulation

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Enclosure:
Table 1 - BNFL Inc. Personnel Training and
Qualification Corrective Action
Commitments

cc w/encl: D. W. Edwards, BNFL

bcc:

RU Office File: (Docket 99-RU-B-0123)

RU RDG FILE

RU Distribution: see attached listing

Office >	RNP	RNP	RNP	
Surname >	McCormick-Barger	P. Carier	D. C. Gibbs	
Date >				

Table 1 – BNFL Inc. Personnel Training and Qualification Corrective Action Commitments

Commitment	Commitment Description	Expected	Requires	Authorization
Number	1	Completion	Incorporation in	basis
		Date	the authorization	document
			basis? ¹	affected
99-CMS-011	Training and	06/10/99	No	
	Development Plan will be			
	revised to clarify line			
	management actions and			
	responsibility to identify			
	position specific training.			
99-CMS-012	Code of Practice for	06/10/99	No	
	training to be revised to			
	provide guidance for			
	specifying position			
	specific training.			
99-CMS-013	Training database to be	06/30/99	No	
	revised to allow tracking			
	of position specific			
	training requirements.			
99-CMS-014	Training department to	04/26/99	No	
	maintain a list of qualified			
	trainers that are allowed			
	to conduct training.			
99-CMS-015	Revise QAPIP to clarify	05/21/99	YES	QAPIP
	QA orientation			
	requirements for			
	employees.			
99-CMS-016	Revise QA orientation	04/26/99	No	
	training to include			
	describing the QA			
	program and obligation to			
	identify nonconforming			
	conditions			
99-CMS-017	Provide additional QA	04/26/99	No	
	orientation training to			
	BNFL staff concerning			
	obligation to identify			
	nonconforming			
	conditions or services.			

¹ "Yes," in the column "Requires Incorporation in the authorization basis," means that the RU expects that the corrective action commitment will be reflected in a revision to the indicated authorization basis document.